

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ABRAHAM PHILIP, M.D.
Plaintiff,

v.

JOHN CRONIN,
Defendant.

**MOTION OF DEFENDANT JOHN CRONIN TO EXTEND DISCOVERY PERIOD
(UNOPPOSED)**

Now comes the Defendant John Cronin and moves that this court extend the Discovery Period in this matter such that all discovery should be completed on or before July 29, 2005.

In support of this motion, Defendant relies upon the Memorandum of Reasons filed herewith.

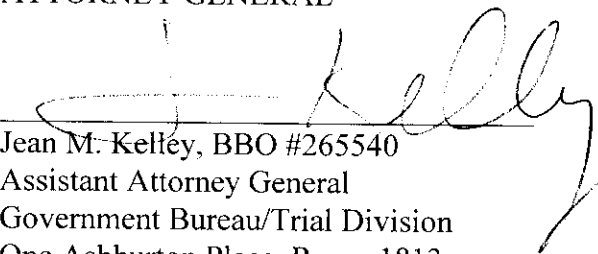
Defendant notes that there is no opposition to this motion.

WHEREFORE Defendant respectfully requests that this court extend the Discovery Period in this matter such that all discovery should be completed on or before July 29, 2005.

Respectfully Submitted,
COMMONWEALTH OF MASSACHUSETTS

By its Attorneys,

THOMAS F. REILLY
ATTORNEY GENERAL



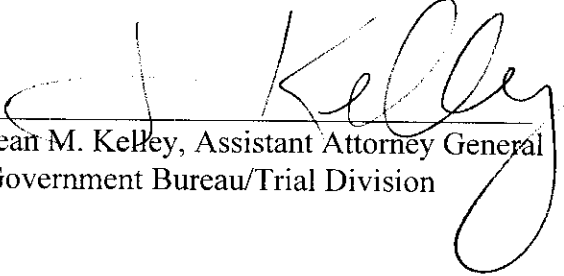
Jean M. Kelley, BBO #265540
Assistant Attorney General
Government Bureau/Trial Division
One Ashburton Place, Room 1813
Boston, MA 02108-1598
(617) 727-2200 ext. 3327
jean.kelley@ago.state.ma.us

April 22, 2005

CERTIFICATE OF SERVICE

I, Jean M. Kelley, hereby certify that I have this date, April 22, 2005, served the foregoing **Notice Of Appearance; Motion to Extend Discovery Period; Memorandum of Reasons; Certification Pursuant to Local Rule 7.1; and Certificate Of Service** upon counsel of record by mailing a copy first class, postage prepaid mail to:

Elaine Whitfield Sharp, Esquire
Daniel S. Sharp, Esquire
WHITFIELD, SHARP & SHARP
196 Atlantic Avenue
Marblehead, MA 01945



Jean M. Kelley, Assistant Attorney General
Government Bureau/Trial Division